

Response to USEPA Comments Received January 10, 2014 to the Draft 2011 Caged Bivalve Study Data for the Lower Passaic River Study Area dated July 18, 2012

No.	Section	Comment	Response
1	Page 3, Table 1-1	Please update QAPP citations for the 2011 RM 10.9 hydrodynamic and 2012 supplemental LRC investigations as both have already been completed and their QAPPs finalized.	The references have been updated as requested.
2	Page 11, Section 2.3, second paragraph	Field activities were also conducted on May 9, 2011 (to pull cages from estuarine locations). Please include in the revised text.	Text has been added to Section 2.3 to describe how water quality measurements were conducted on May 9 and June 8, 2011, at locations where cages were retrieved at the end of the study period.
3	Page 12, Table 2-3	The column titled Day 25 is incorrect. Please revise to read Day 35.	The column has been changed to "Day 35" as requested.
4	Page 16, First Paragraph, first sentence	"because" is spelled incorrectly, please revise.	The spelling for "because" has been revised as requested.
5	Page 16, First Paragraph, second sentence	Text states that cages at LPR1XX lost on days 56 and 75. Should be day 56 only. Please revise.	Text has been revised as requested.
6	Page 16, Second paragraph, first sentence	Text states mussels were pulled from estuarine locations on Day 62; however, in the first paragraph on page 15 the text states Day 61. Please revise accordingly.	Text has been revised to Day 61 in Section 2.4.
7	Page 19, Table 3-2	ECD is not defined in the list of acronyms. Please include Electron Capture Detector in the list that follows.	The text has been added to the acronym list as requested.
8	Page 22, Section 4.1, second sentence	Please note the typographical error, ribbedmussels should be revised to two words.	The text has been revised to two words as requested.

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9	Appendix D, Table D-1	<p>The following errors or potential errors were noted, please review and if needed, revise accordingly:</p> <ol style="list-style-type: none"> Page 1, location LPR2AD on 3/9/11 there are two sets of water quality data for a depth of 1 foot. Page 1, location LPR2AD on 3/9/11 please verify if the conductivity readings are correct as review of over site notes indicate levels of 1.47 mS/cm, where the table lists it as 0.147 mS/cm. Page 3, location LPR5YY on 3/9/11 is missing; however, water quality readings for that location are provided following those for location LPR5XX. Page 3, location LPR5XX on 3/9/11 was moved and readings were taken at both locations. It is recommended that the location ID on Table D-1 specify the old vs new location LPR5XX. 	<ol style="list-style-type: none"> Table D-1 has been revised to include only one set of water quality data for LPR2AD on 3/9/11 at a depth of 1 ft. Text has been revised to 1.47 mS/cm for the conductivity at location LPR2AD on 3/9/11. Table D-1 has been revised to provide water quality measurements for LPR5YY, and to remove the erroneous measurement assigned to LPR5XX (i.e., the second half of LPR5XX data were for LPR5YY). Table D-1 has been revised to differentiate between the old and new location for LPR5XX.
10	Appendix G, Page 3, Third Paragraph, second sentence	Text states that cages at LPR1XX lost on days 56 and 75. Should be day 56 only. Please revise.	Text has been revised as requested.
11	Appendix L, Tables L-2 through L-7	<p>The reporting of non-detect values are inconsistent as follows:</p> <ul style="list-style-type: none"> Tables L-1 and L-7, non-detects reported at MDL level followed by a U qualifier. Tables L-2, L-3, and L-4, non-detects reported at RL (rather than MDL) level followed by a U qualifier. Tables L-5 and L-6, MDL and RL values not included on report, so it is unknown whether non-detects were reported at RL or MDL level. <p>Please clarify why some values are based on MDL, where others are based on RLs.</p>	All non-detect values were reported to the laboratory equivalent of the reporting limit. Non-detect values for high-resolution analysis (i.e., PCB congener, PCDD/PCDF, and pesticides) provided in Tables L-5, L-6, and L-7 were reported to the sample-specific EDLs consistent with laboratory SOPs and common laboratory practices for reporting high-resolution data. This practice was also documented in Worksheet 15 of the Benthic QAPP. Non-detect metal values provided in Table L-1 were reported to the sample-specific MDL. As is common for trace metals analyses and as described in the laboratory SOPs, this value is considered the reporting limit; the MRL value on Form 1 is considered the PQL.
12	Table L-4	Please note the typographical error, Dibenzo(a,c+a,h)anthracene should be Dibenz(a,c+a,h)anthracene.	Text has been revised as requested.
13	Appendix L, Tables L-5 and L-6	No reporting limits are provided on the corresponding Forms 1, so it is unclear if non-detects are reported to MDL or RL (similar to comment 11).	Please see response to Comment No. 11. Non-detect values for PCB congener (Table L-5) and PCDD/PCDF (Table L-6) results were reported to the sample-specific EDLs.

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14	Appendix L, Tables L-5 and L-6	<ul style="list-style-type: none"> a. Detected values for Aroclors are rounded to 2 significant figures prior to calculating Total Aroclors. Total values in the table are accurate using the rounded values, but Total Aroclor values would be different if calculated from results on Form 1's. Appendix K, section 3 states that significant figures will be applied as the last step of the calculation of sums and averages. This does not appear to have been done, please review and comment as needed. b. What is the significance of PCB Aroclors-CPG? It appears to be the same as Total PCB Aroclors. Please provide details about aroclors used for this total. c. Data in table is described as "equalized data" based on the report provided in Appendix M which also presents results that are not "equalized". The laboratory standard operating procedure (SOP) states that the data was corrected for quantitative interferences using a proprietary program named "Equalizer". 	<ul style="list-style-type: none"> a. Significant figures were adjusted during the validation of the 2009 LPRSA fish/crab and sediment data. Significant figures of LPRSA caged bivalve data were adjusted similarly for consistency. Appendix K has been revised to clarify, and the memorandum that describes the significant figure adjustment applied during validation of the 2009 LPRSA fish/crab and sediment data has been provided as an attachment to Appendix K. b. This was a duplicate of the total PCB Aroclor calculation and has been removed from Appendix L. c. The equalization process was used as described in the laboratory SOP. The use of equalized data was discussed with USEPA when the 2009 Fish/Decapod and Benthic QAPPs were being finalized. The equalized data were used, and the unequalized data were provided in the laboratory data package, as agreed with USEPA. A footnote has been added to Table L-5, stating that the PCB congener data are equalized data, and that unequalized data are provided in Appendices M and N.
15	Appendix L, Table L-6	Total HxCDD for sample LPR7-ECST-Comp03 is reported without J-qualifier, but all individual detected HxCDD compounds used to sum were reported as estimated values (J). Please correct table appropriately.	Homolog totals and their qualifiers were provided by the laboratory. The only adjustment made to homolog qualifiers was to change the EMPC qualifier to an EMPC-J qualifier to maintain consistency within the dataset. The total HxCDD concentration for sample LPR7-ECST-Comp03 was not qualified by the laboratory, and therefore no adjustments to the qualifiers have been made.